

JAMES HAWKINS APLC  
James R. Hawkins, Esq. (#192925)  
Gregory Mauro, Esq. (#222239)  
Michael Calvo, Esq. (#314986)  
9880 Research Drive, Suite 800  
Irvine, CA 92618  
Tel.: (949) 387-7200  
Fax: (949) 387-6676  
Email: James@jameshawkinsaplc.com  
Email: Greg@jameshawkinsaplc.com  
Email: Michael@jameshawkinsaplc.com

Attorneys for Plaintiff EDWIN JUAREZ individually and on  
behalf of all others similarly situated

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

EDWIN JUAREZ, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

SAIA MOTOR FREIGHTLINE LLC; a  
Louisiana Limited Liability Company, and  
DOES 1 through 50, inclusive,

Defendants.

Case No. 3:20-cv-04565-RS  
Hon. Richard Seeborg

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER REQUESTING VOLUNTARY  
DISMISSAL PURSUANT TO FED. R. CIV. P.  
41(a)(A)(ii)**

1 Pamela Carroll Calvet, SBN 112612  
2 Daria Dub Carlson, SBN 150628  
3 BRYAN CAVE LEIGHTON PAISNER LLP  
4 120 Broadway, Suite 300  
5 Santa Monica, California 90401-2386  
6 Telephone: (310) 576-2100  
Facsimile: (310) 576-2200  
Email: pccalvet@bclplaw.com  
daria.carlson@bclplaw.com

7 Allison C. Eckstrom, SBN 217255  
8 BRYAN CAVE LEIGHTON PAISNER LLP  
9 3161 Michelson Drive, Suite 1500  
10 Irvine, California 92612-4414  
11 Telephone: (949) 223-7000  
12 Facsimile: (949) 223-7100  
13 Email: allison.eckstrom@bclplaw.com

14 Attorneys for Defendant Saia Motor Freight Line, LLC  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**STIPULATION**

Plaintiff EDWIN JUAREZ (“Plaintiff”) and Defendant SAIA MOTOR FREIGHTLINE LLC, (“Defendant”), by and through their respective counsel of record HEREBY STIPULATE AND AGREE, that pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), this action is dismissed in its entirety *with prejudice* as to Plaintiff’s individual claims against Defendant and *without prejudice* as to the putative class and putative class claims against Defendant.

**IT IS SO STIPULATED.**

Dated: July 28, 2021

Respectfully Submitted by  
JAMES HAWKINS APLC

By: /s/ Gregory Mauro

James Hawkins  
Gregory Mauro  
Michael Calvo

Attorneys for Plaintiff Edwin Juarez

Dated: July 28, 2021

BRYAN CAVE LEIGHTON PAISNER LLP

By: /s/ Daria Dub Carlson

Allison C. Eckstrom  
Pamela Carroll Calvet  
Daria Dub Carlson

Attorneys for Defendant Saia Motor Freight  
Line, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on July 28, 2021 I electronically filed the foregoing with the Clerk of the Court for the U.S. District Court, for the Northern District of California using the CM/ECF system. All participants are registered CM/ECF users, and will be served by the CM/ECF system.

Dated: July 28, 2021

By: /s/ Gregory Mauro  
GREGORY MAURO, ESQ.

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 EDWIN JUAREZ, individually and on behalf  
11 of all others similarly situated,

12 Plaintiff,

13 v.

14 SAIA MOTOR FREIGHTLINE LLC; a  
15 Louisiana Limited Liability Company, and  
16 DOES 1 through 50, inclusive,

17 Defendants.  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No. 3:20-cv-04565-RS  
Hon. Richard Seeborg

**~~PROPOSED~~ ORDER RE JOINT  
STIPULATION REQUESTING  
VOLUNTARY DISMISSAL PURSUANT TO  
FED. R. CIV. P. 41(a)(A)(ii)**

**~~PROPOSED~~ ORDER**

The Court has reviewed and considered the Joint Stipulation Requesting Voluntary Dismissal Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) (the “Stipulation”) filed by Plaintiff EDWIN JUAREZ and Defendant SAIA MOTOR FREIGHTLINE LLC (“Defendant”) (collectively, the “Parties”). The Parties’ Stipulation requesting dismissal of this entire action with prejudice as to Plaintiff’s individual claims and without prejudice as to the putative class and putative class claims, shall be and hereby is GRANTED. The case is hereby dismissed in its entirety, and with prejudice as to Plaintiff’s individual claims against Defendant and without prejudice as to the putative class and putative claims against Defendant.

**IT IS SO ORDERED.**

DATED: July 30, 2021

  
Hon. Richard Seeborg  
United States District Court Judge